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23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 Cheryl Davis,

26 Case No. 2:18-cv-02181-APG-VCF

27 Plaintiff,

28 **SECOND STIPULATION AND  
ORDER TO CONTINUE  
DEADLINE FOR EXPERIAN TO  
RESPOND TO PLAINTIFF'S  
SECOND AMENDED COMPLAINT  
BY 30 DAYS**

v.

29 Carrington Mortgage Services, LLC;  
30 Experian Information Solutions, Inc.; and  
31 TransUnion LLC,

32 Defendants.

33 **(SECOND REQUEST)**

34 Complaint filed: 11/13/2018

35 **STIPULATION**

36 Case No. 2:18-cv-02181-APG-VCF

1 Pursuant to Local Rules 7-1 and IA 6-1, Plaintiff Cheryl Davis (“Plaintiff”) and Defendant  
 2 Experian Information Solutions, Inc. (“Experian”) (collectively the “Parties”), by and through their  
 3 attorneys, hereby stipulate to extend the deadline for Experian to respond to Plaintiff’s Second  
 4 Amended Complaint as follows:

5 1. Plaintiff filed her original Complaint in this case on November 13, 2018. (ECF No.  
 6 1.)

7 2. Plaintiff filed a First Amended Complaint on December 5, 2018. (ECF No. 14.)

8 3. With the Court’s leave, Plaintiff filed a Second Amended Complaint (“SAC”) on  
 9 April 22, 2019. (ECF No. 46.)

10 4. On May 13, 2019, Experian moved to dismiss Plaintiff’s SAC. (ECF No. 49.)

11 5. On April 10, 2020, the Court granted Experian’s motion to dismiss in its entirety.  
 12 (ECF No. 82.)

13 6. On April 13, 2020, Plaintiff filed a Notice of Appeal. (ECF No. 86.)

14 7. On June 10, 2021, the Ninth Circuit reversed this Court’s order of dismissal and  
 15 remanded the case for further proceedings. (ECF No. 92.) The Ninth Circuit issued its mandate on  
 16 July 2, 2021. (ECF No. 93.)

17 8. On July 16, 2021, the parties filed a stipulation to continue Experian’s deadline to  
 18 respond to the SAC by 30 days to August 16, 2021. (ECF No. 95.)

19 9. On July 16, 2021, the Court granted the Parties’ stipulation, and therefore Experian’s  
 20 current deadline to respond to the SAC is August 16, 2021. (ECF No. 96.)

21 10. The Parties are actively engaged in settlement discussions, but require additional  
 22 time to continue those discussions. The Parties therefore agree that there is good cause to continue  
 23 the responsive pleading deadline 30 days, up to and including September 15, 2021, to allow the  
 24 Parties to continue their settlement discussions without the need for expending additional resources.

25 11. This is the second request to extend Experian’s deadline to respond to the SAC.

26 12. This stipulation is made in good faith and is not filed for an improper purpose, such  
 27 as undue delay.

28 STIPULATION

1           NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS  
 2 HEREBY STIPULATED AND AGREED, by and between the Parties, that Experian's deadline to  
 3 respond to Plaintiff's SAC shall be continued up to and including September 15, 2021.

4           **IT IS SO STIPULATED.**

5           Dated August 13, 2021.

<p><b>KNEPPER &amp; CLARK LLC</b></p> <hr/> <p><i>/s/ Matthew L. Knepper</i></p> <p>Matthew I. Knepper, Esq. Nevada Bar No. 12796 Miles N. Clark, Esq. Nevada Bar No. 13848 10040 W. Cheyenne Ave., Suite 170-109 Las Vegas, NV 89129 Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com</p> <p><b>FREEDOM LAW FIRM</b></p> <hr/> <p>David H. Krieger, Esq. Nevada Bar No. 9086 8985 S. Eastern Avenue Suite 350 Las Vegas, NV 89123 (702) 880-5554 Email: Ghaines@freedomlegalteam.com</p> <p><i>Counsel for Plaintiff</i></p>	<p><b>NAYLOR &amp; BRASTER</b></p> <hr/> <p><i>/s/Jennifer L. Braster</i></p> <p>Jennifer L. Braster, Esq. Nevada Bar No. 9982 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145 Email: jbraster@nblawnv.com</p> <p><b>JONES DAY</b></p> <hr/> <p>Cheryl L. O'Connor, Esq. 3161 Michelson Drive Irvine, CA 92612 Email: coconnor@jonesday.com</p> <p><i>Counsel for Defendant</i> <i>Experian Information Solutions, Inc.</i></p>
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21           **ORDER**

22           **IT IS SO ORDERED**



25           UNITED STATES MAGISTRATE JUDGE

26           Dated: 8-16-2021

27           STIPULATION